

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON SALEM DIVISION

In re:)
)
TIMOTHY BRIAN CRUNKLETON,) Case No. B-22-50764 C-13W
)
Debtor(s).)

OBJECTION TO CONFIRMATION

Now comes Kathryn L. Bringle, Chapter 13 Trustee, who objects to confirmation of the Debtor(s) Proposed Plan and in support of her objection shows the following:

1. Timothy Brian Crunkleton (“the Debtor(s)”) filed a Chapter 13 Petition on December 22, 2022. The Debtor(s) filed an Amended Proposed Plan on February 9, 2023 (Doc. 18). Notice of Plan and Time for Filing Objection Thereto was filed on February 21, 2023 (Doc. 21).

2. The Trustee objects to confirmation of the proposed plan because tax returns have not been filed by either Debtor for the year 2019 according to the proof of claim of the Internal Revenue Service.

WHEREFORE, the Trustee respectfully requests that:

1. Confirmation of the proposed plan be denied;
2. The Court grant such additional and further relief as it deems just and proper.

Date: March 14, 2023
KLB/plc

s/ Kathryn L. Bringle
Chapter 13 Trustee

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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that the foregoing Objection to Confirmation was served on the following parties by mailing a copy by first-class postage prepaid mail addressed as follows:

TIMOTHY BRIAN CRUNKLETON
408 N ELM STREET
APARTMENT B
CHERRYVILLE, NC 28021

JOHN T ORCUTT
6616-203 SIX FORKS ROAD
RALEIGH, NC 27615

LAW OFFICES OF JOHN T ORCUTT
ATTN: ATTORNEY BEN BUSCH
2100 W CORNWALLIS DRIVE, UNIT O
GREENSBORO, NC 27408

AIS PORTFOLIO SERVICES LLC
ATTN ALLY FINANCIAL DEPT
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY, OK 73118

INTERNAL REVENUE SERVICE
P O BOX 7346
PHILADELPHIA, PA 19101-7346

US ATTORNEY
MIDDLE DISTRICT OF NORTH CAROLINA
101 S EDGEWORTH ST 4th FLOOR
GREENSBORO, NC 27401

CRYSTAL R SIMMONS
BANKRUPTCY SPECIALIST
INTERNAL REVENUE SERVICE
INSOLVENCY 4905 KOGER BOULEVARD SUITE 1029
GREENSBORO NC 27407-2734

NOT ON MATRIX

Date: March 14, 2023
KLB/plc

s/ Kathryn L. Bringle
Chapter 13 Trustee